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8	Kurt Bonds, Esq.		
9	Nevada Bar No.: 6228 6605 Grand Montecito Parkway, Suite 200		
	Las Vegas, Nevada 89149		
10	IN THE UNITED STA	TES DISTRICT COURT	
11	IN THE UNITED STATES DISTRICT COURT		
12	FOR THE DISTRICT OF NEVADA		
13	MARY J. SOTO,	Case No. 2:21-cv-01389-JAD-EJY	
14	Plaintiff,	IOINT STIDLY ATION AND ODDED	
15	v.	JOINT STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES	
16	TRANS UNION LLC,	(FIRST REQUEST)	
	Defendant.	(FIRST REQUEST)	
17		J	
18	Plaintiff, and Defendant Trans Union L	LC ("Trans Union") ("the Parties") hereby iointly	
19	Plaintiff, and Defendant Trans Union LLC ("Trans Union") ("the Parties") hereby jointly		
20	move to extend all deadlines set forth in the Stipulated Discovery Plan and Scheduling Orde		
21	filed with this Court on September 28, 2021, (Dkt. 11) by a period of sixty (60) days.		
22	1. On July 26, 2021, Plaintiff filed her Complaint (Dkt. 1), against Defendant Tran		
23	Union LLC ("Trans Union").		
24	3. Defendant Trans Union filed its Answer to Plaintiff's Complaint on September		
25	17, 2021 (Dkt. 9).		
$\begin{bmatrix} 25 \\ 26 \end{bmatrix}$	4. The Parties require more time and accompanying deadlines from the Court. The		
	parties are discussing settlement. Absent settlement, the parties intend to take depositions of on		
27	another and third parties.		
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- 5. The Parties request the proposed schedule while continuing to discuss resolution of the claims in this case without engaging in unnecessary and costly depositions. The Parties have served written discovery and both parties are pending responses to the written discovery. In addition, the Parties require additional time to conduct third-party discovery as to Plaintiff's alleged damages.
- 6. No party will be prejudiced by this Court granting this Stipulation as all parties jointly seek an extension of these deadlines. Moreover, the Parties believe that allowing the extension will serve the ends of judicial economy.
 - 7. Moreover, the requested extensions are not sought for the purposes of delay.
 - 8. Accordingly, the parties request adoption of the following deadlines:

a. Discovery Plan:

Discovery Cut-off	04/19/2022
Deadline to Provide Expert Disclosures	2/18/2022
Deadline to Disclose Rebuttal Expert Disclosures	3/19/2022
Deadline to File Dispositive Motions	05/17/2022

b. Pre-Trial Order: The parties shall file a joint pretrial order no later than 6/17/2022 or thirty (30) days after the date set for filing dispositive motions. In the event that parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motion or further order of the Court.

WHEREFORE, Plaintiff and Trans Union respectfully requests this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

DATED: December 9, 2021

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1	QUILLING, SELANDER, LOWNDS,	LAW OFFICES OF MITCHELL GLINER
2	WINSLETT & MOSER, P.C.	
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7	Counsel for Trans Union LLC	Counsel for I tuthliff
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10	IT IS SO ORDERED.	
11	II IS SO ORDERED.	
12	2 .00	\cap
13	Clayna I. Louch	ak_
14	UNITED STATES MAGISTRATE JUDGE	
15	Dated this 9th day of December 2021.	
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